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FEB 19 2019

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI

**UNITED STATES DISTRICT COURT**  
**for the**  
**5th Circuit of The Northern Mississippi**

**AMENDED COMPLAINT**

**I. The Parties to This Complaint**

**A. The Plaintiff -**

Zorri N. Rush  
6912 Mount Vernon Rd  
Eupora / Webster  
MS 39744  
662 753 1249  
[zorrirush@hotmail.com](mailto:zorrirush@hotmail.com)

**B. The Defendants -**

Eupora Family Medical Center  
1301 Veterans Memorial Blvd  
Eupora, MS 39744  
662-258-7200

**II. JURISDICTION**

The state of Mississippi judiciary has dismissed the plaintiff due to his mental disabilities and disregard his legal complaints. The federal courts have jurisdiction over matters of denial of US Constitutional Rights and the refusal to investigate the claim by the State and department administration is evidence that procedural due process and Americans with Disabilities are being underserved in this area. With this in mind the case against the defendants should move forward to ensure justice.

U.S. Congressman Trent Kelly has been asked to inform the appropriate committees of the plaintiff's intent to seek damages caused by the gross negligence and ongoing fraud.

The defendants refused to address allegations of gross negligence and violations of federal law that have caused irreparable damages in violation of 9 USC 4: Failure to arbitrate under federal agreement

**III. STATEMENT OF CLAIM**

Defendant employs Jewell Huffman III, MD who discharged plaintiff in this case for reasons related to mental and physical disabilities in violation of 42 USC 2000d. Escalations of these complaints produced no remedies after the actions that allowed the court to obtain jurisdiction during disputed claims being ignored by the Mississippi Attorney General and Congressional obligations to regulate the medical industry.

#### **IV. RELIEF**

For the purposes of amending this complaint the plaintiff alleges the defense actions are in violation of the Americans with Disabilities Act by denying a disabled patient access to medical treatment (in violation of 42 USC 2000d) and the damages associated with these actions are irreparable and entitle plaintiff to relief in the following.

1. Issue Summons ordering the defendants to appear before the court.
2. Order the defendants to submit a certified copy of the transcript and record, including evidence regarding filing and processing of applications filed by plaintiff for charity or federal funding assistance and any responses or conclusions related to the matter used during period plaintiff was a patient including responses to complaints and investigation details.
3. Grant any further relief as may be just and proper under the circumstances of the case.

*Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11. I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.*

**Date of signing:**the 29th day of January 2019

**Signature of Plaintiff** \_\_\_\_\_s/Zorri N. Rush

**Printed Name of Plaintiff** \_\_\_\_\_Zorri N. Rush



6912 Mount Vernon Rd  
Eupora, MS 39744

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US Clerk  
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Oxford, MS 38655